

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.,
Plaintiffs, Counter-defendant

CASE NO. 4:20-cv05640-YGR-TSH

APPLE INC.,
Defendant, Counterclaimant

CASE NO. 4:11-cv-06714-YGR

CASE NO. 4:19-cv-03074-YGR

DONALD R. CAMERON, et al.,
Plaintiffs,

APPLE INC.,
Defendant

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' JOINT ADMINISTRATIVE
MOTION TO FILE UNDER SEAL THE
JOINT DISCOVERY LETTER BRIEF AND
SUPPORTING EXHIBITS REGARDING
CUSTODIANS**

1 Pursuant to Civil Local Rule 79-5, Plaintiffs have filed a Joint Administrative Motion to File
 2 Under Seal The Joint Discovery Letter Brief and Supporting Exhibits Regarding Additional Apple
 3 Custodians (“Joint Discovery Letter Brief”). In support, Defendant Apple Inc. (“Apple”) filed the
 4 supporting declaration of Jay P. Srinivasan.

5 Having considered the Joint Administrative Motion, all associated declarations, exhibits, and
 6 any argument of counsel, and for good cause appearing:

7 **IT IS HEREBY ORDERED** that Plaintiffs' Joint Administrative Motion is **GRANTED**.

8 Accordingly,

9 (1) The unredacted version of the Joint Administrative Motion shall remain under seal;
 10 (2) The public shall only have access to the version of the Joint Administrative Motion in
 11 which portions of the following pages have been redacted:

Document Containing Confidential Information	Reason for Sealing
Joint Discovery Letter Brief, pp.3-5	Contains information that reveals correspondence regarding sensitive business decisions regarding app review, device security, and the protection of consumer privacy.
Exhibit 1, pp.6-8	Contains information that reveals the structure of certain Apple organizations and provides the names of non-custodial individuals.
Exhibit 4, p.2	Contains information about accessing a nonpublic database that Apple uses to transfer its produced documents to Plaintiffs.
Exhibit 6, pp.4, 6-10	Contains information that reveals the details of confidential documents Apple produced regarding Apple's revenue model, decisions related to the development of certain Apple systems, correspondence among Apple executives regarding the creation of the Mac App Store, information on Apple's competitors, information regarding Apple's app review process, and information regarding Apple's pricing strategies.

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IT IS SO ORDERED.
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6 DATED: _____, 2020
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The Honorable Thomas S. Hixson
United States Magistrate Judge